

Weimer, Noreen

From: Novak, Dion
Sent: Tuesday, November 04, 2014 3:09 PM
To: Weimer, Noreen
Subject: FW: Valleycrest - Work Plan for Supplemental Groundwater Sampling

Additional email

From: Mike Samples [mailto:mikes@demaximis.com]
Sent: Thursday, August 21, 2014 9:38 AM
To: Novak, Dion
Cc: Steve Siegel; Wood, Nicole; Scott Glum
Subject: RE: Valleycrest - Work Plan for Supplemental Groundwater Sampling

Dion,

In regards to item #4 below, I thought we captured all of the locations where VOCs met or exceeded MCL's during the '09 event. Can you point me to the wells you are referring too?

Thanks,
Mike

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Michael H. Samples
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>>> "Novak, Dion" <novak.dion@epa.gov> 8/20/2014 3:10 PM >>>
>
Mike

A more thorough review of this proposal yields similar comments.

1. The last full round of groundwater data was collected at the site over 10 years ago (the 2009 event was not a full round of sampling). As a result, current plume conditions for the purposes of design is outdated. As I indicated in my email below, I will be requiring a full round of groundwater sampling from all previously sampled wells as part of pre-design so that current conditions can be compared to previous data to assist in RD for the site remedy.

2. Wells that were not above MCLs in 2009 were not sampled at that time. This does not yield the most accurate definition of the plume that will be necessary to fully design the selected site remedy, both for modeling as well as for plume capture well design.
3. MNA was investigated during the State led RI and was ruled out for a number of reasons..it was also removed from the list of alternatives that were included in the final FS that EPA used during remedy selection. The main comments that the State raised during the FS remain. It was not shown that a consistent downward trend for contaminant data existed for all wells (in fact, it is increasing at some wells) , it was not demonstrated that source control was in place, and not enough rounds of data were collected to assess contaminant trends, all of which are critical for MNA determinations. There is NAPL present at the site and a significant percentage of waste disposed at the site is located at or below the water table in a sole source aquifer.
4. Finally, this round of sampling does not include all of the wells where VOCs were detected at or above their MCLs in the 2009 data collection event so its overall purpose is flawed.

Given these significant issues with the workplan, EPA and OEPA do not endorse this data collection at this time and these comments would again be raised in any future review of data collected pursuant to this plan.

Scott and I recommend a full data collection event as outlined previously so that current conditions can be ascertained, both for nature and extent as well as for potential POTW disposal decisions.

If you have any questions, please contact me.

Dion

From: Novak, Dion
Sent: Wednesday, July 30, 2014 11:44 AM
To: Mike Samples
Cc: Michael Miller; Steve Siegel; Scott Glum; Wood, Nicole
Subject: RE: Valleycrest - Work Plan for Supplemental Groundwater Sampling

Mike

Have begun review of this plan but will be on vacation next week.....any feedback would probably have to wait until my return.

A quick comment for the group.....as part of the RD, I will be asking for a complete round of sampling to demonstrate current conditions. This would include all of the wells and all of the analytes. This will help to determine what the current state of the plume is.....as you may recall, one of the points from the recent GW presentation to EPA revolved around the fact that the data was very old and may not reflect current conditions.

Just something to consider as I gather my thoughts on this workplan submittal.

Dion

From: Mike Samples <mikes@demaximis.com>
Sent: Friday, July 18, 2014 10:28 AM
To: Novak, Dion
Cc: Michael Miller; Steve Siegel; Scott Glum
Subject: Valleycrest - Work Plan for Supplemental Groundwater Sampling

Dion,

As we discussed recently, the Group has preliminarily authorized CRA to perform a supplemental groundwater sampling event at the Site and would like to take into consideration any feedback you might have on the Work Plan (attached).

Thanks,
Mike

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